

PHILLIP A. TALBERT
United States Attorney
JOSEPH D. BARTON
HENRY Z. CARBAJAL III
Assistant United States Attorneys
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

DENNIS FALASCHI,

Defendant.

Case No. 1:22-cr-00103-JLT-SKO

STIPULATION TO CONTINUE CHANGE
OF PLEA HEARING

IT IS HEREBY STIPULATED between the parties that the change of plea hearing scheduled for April 22, 2024, may be continued until May 28, 2024, at 9:00 a.m., before the Honorable Jennifer L. Thurston. The parties have met and conferred regarding their review of the discovery in this case on multiple occasions within the past month and have further review to perform. The undersigned attorneys also have multiple other matters pending before the courts, including the undersigned government attorney who has a multi-week financial fraud trial in this Court beginning on April 25, 2024. The parties are close to reaching a resolution and believe that they will have a finalized plea agreement filed with the Court within one month.

Accordingly, the parties request that the Court exclude time under the Speedy Trial Act from April 22, 2024, through May 28, 2024, for purposes of plea negotiations, defense preparation, and continuity of defense counsel pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

Dated: April 17, 2024

/s/ Marc Days

MARC DAYS
Counsel for Dennis Falaschi

Dated: April 17, 2024

/s/ Joseph Barton

JOSEPH BARTON
HENRY CARBAJAL III
Assistant United States Attorneys

ORDER

Upon the parties' stipulation, and for good cause shown, the change of plea hearing that is scheduled for April 22, 2024, is continued until May 28, 2024, at 9:00 a.m., before the Honorable Jennifer L. Thurston. Time is excluded under the Speedy Trial Act from April 22, 2024, through May 28, 2024, for purposes of plea negotiations, defense preparation, and continuity of defense counsel pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **April 18, 2024**

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE